

Commercial Availability & Pro-Active Sourcing

Commercial Availability is missing one component, which is a pro-active approach to either contact for an Organic ingredient or commitment to development of a new Organic ingredient.

As a supplier of ingredients I have companies call me looking for an Organic Ingredient knowing that without a contract that the ingredient is not available. This scenario plays out every few months so the company can document that the ingredient is not available to their certifier. An exemption should be granted only if the company has a contract for further delivery of the exempted organic ingredient.

If a company knows that that an ingredient that they are formulating will require more of a specific ingredient that is currently available, the company should be required, in their organic plan, to show steps they are taking to make sure the ingredient will be produced for them during the next crop cycle. (Taking into account world wide sourcing) We are seeing an upswing of companies moving to conventional ingredients as orders for their organic products increase rapidly. This "emergency" situation should not be used to replace organic ingredients permanently.

Creating of Organic analog of conventional ingredients is a vital step to increasing consumer confidence in Organics and the intent of OFPA. Companies that use conventional ingredients in the 5% category should take steps to use products that contain Organic ingredients in an effort to promote further development of these conventional alternatives. As an example there is baking powder that contains organic ingredients. Allowing the use of conventional baking powder without Organic components serves to diminish the development on Organic alternatives. If functionality is the same then there should be a requirement for

the use of these "Made With" ingredients. I have been told on more than one occasion that my suggestions are already part of the existing rule. If that is true there needs to be a clarification to the Organic community, however if pro-active sourcing is not specifically covered, then it should be codified into the rule. Thank you very much for your consideration of this important issue.

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